

1 DEMETRAS & O'NEILL
2 J. Craig Demetras
State Bar No. 4246
3 Shelly T. O'Neill
State Bar No. 986
4 230 E. Liberty Street
Reno, Nevada 89501
(775) 348-4600
6 (775) 348-9315 Facsimile

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8 Attorneys for Finley River LLC,
9 Hillcrest Mining Company, LLC, and
Hi-Tech Exploration, LTD

10 IN THE UNITED STATES BANKRUPTCY COURT
11 FOR THE DISTRICT OF NEVADA

13 IN RE:

14 Case No. 13-50301-mkn

15 Chapter 11

16 RODEO CREEK GOLD INC.,

17 Debtor.
18 _____ /
19 **RESERVATION OF RIGHTS
REGARDING MOTION FOR AN
ORDER (A) APPROVING THE SALE,
(B) AUTHORIZING THE SALE,
ASSUMPTION, AND ASSIGNMENT
OF CERTAIN EXECUTORY
CONTRACTS AND UNEXPIRED
LEASES, AND (C) GRANTING
FURTHER RELIEF**

21 Hearing Date: May 2, 2013
Hearing Time: 1:30 pm

23 Hillcrest Mining Company LLC (Hillcrest), Finley River Company LLC. (Finley
24 River), and Hi-Tech Exploration Ltd. (Hi-Tech), by and through their counsel record,
25 hereby file their Reservation of Rights Regarding Debtors' Motion for an Order (A)
26 Approving the Sale, (B) Authorizing the Sale, Assumption, and Assignment of Certain
27 Executory Contracts and Unexpired Leases, and (C) Granting Further Relief.

1 Hillcrest, Finley River and Hi-Tech are owners of mining claims on which the
2 Debtors are currently conducting mining and/or exploration activities. The mining claims
3 owners have previously filed a Reservation of Rights (Doc. 325) in which they attached
4 as Exhibits documents recorded in Elko County which relate to the chain of title and
5 lease interests on the mining claims. In the Reservation of Rights, the mining claims
6 owners requested that any notice of sale distributed by the Debtors be required to contain
7 a description of Royalty interest sufficient to place potential purchasers on notice of the
8 existence and nature of the Royalty interests. An order on the DIP Financing Order was
9 entered included language reserving the rights of these mining claim owners concerning
10 the nature and extent of their claims. The mining claims owners are requesting the Court
11 to provide the same protections and reservations of rights in any order entered approving
12 the sale of the Debtors' assets.

13 The mining claims owners filed an Objection to the proposed Cure Amount (Doc.
14 362) in which they re-iterated their reservation of rights.

15 After a review of the docket on file with the Court and all public documents
16 available at the time of filing this pleading, the mining claims owners are unclear as to the
17 treatment of their claims. Based upon the foregoing, they incorporate by reference the
18 Reservation of Rights (Doc 325) and the Objection to Proposed Cure Amount (Doc 362),
19 and request the Court for an insertion of language in the sale order for a reservation of
20 rights and for such additional relief as the Court deems appropriate under the
21 circumstances.

22 DATED this 29th day of April, 2013.

23 Demetras & O'Neill
24 /s/ J. Craig Demetras _____
25 By: J. Craig Demetras
26 Attorney for Finley River LLC, Hillcrest
27 Mining Company, LLC and Hi-Tech
28 Exploration, LTD